

Victor J. Mastromarco, Jr. (Mich Bar No P34564) Hearing Date: May 12, 2006
MASTROMARCO & JAHN, P.C. Time: 10:00 a.m.
Counsel to H.E. Services Company &
Robert Backie
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

DELPHI CORPORATION, et al.,

Chapter 11
Case No. 05-44481 (RDD)
(Jointly Administered)

Debtors.

**SUPPLEMENT TO H.E. SERVICES COMPANY, and ROBERT BACKIE,
Majority Shareholder MOTION FOR RELIEF FROM THE AUTOMATIC
STAY UNDER SECTION 362 OF THE BANKRUPTCY CODE**

Now comes the Movants, H.E. Services Company, and Robert Backie, Majority Shareholder, by and through their attorneys, who hereby files this supplement to the Creditors' Motion For Relief from Automatic Stay under Section 362 of the Bankruptcy Code for the reasons as set forth more fully below:

1.

That the Creditors hereby clarifies the relief requested in their Motion and hereby affirmatively state that they are only seeking in their motion a conditional lifting of the stay for the sole and limited purpose of prosecuting (and possibly mediating) their previously filed claims against the Debtor in the case of H.E.

Services Company & Robert Backie vs. Delphi Automotive Systems, LLC (case number 05-10053) before the Honorable David M. Lawson in the Federal District Court for the Eastern District of Michigan Northern Division.

2.

That the Creditors hereby agree not to enforce any decision and/or settlement without this Court's approval, and the Creditors are not seeking to have this Court lift the stay (at this time) to enforce any decision and/or settlement which may ultimately be reached in the Federal District Court.

3.

That the relief requested by the Movants is consistent with the relief requested by other creditors upon which the stay has been lifted by this Court. (See **Exhibit 1**).

WHEREFORE, Movants respectfully request that the Court enter an order modifying the automatic stay to allow the action to proceed to either a final judgment or a settlement. At this time the Movants are not seeking that the stay be lifted for enforcing a settlement and/or judgment.

Dated: April 18, 2006

Respectfully submitted,

MASTROMARCO & JAHN, P.C.

s/ Victor J. Mastromarco, Jr.
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